

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

Seadrill Partners, LLC, et al.<sup>1</sup>

Reorganized Debtors.

Chapter 11

Case No. 20-35740 (DRJ)

(Jointly Administered)

**SQUIRE PATTON BOGGS (US) LLP'S APPLICATION  
FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSES**

**This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the Court may consider evidence at the hearing and may decide the motion at the hearing.**

**Represented parties should act through their attorney**

Squire Patton Boggs (US) LLP ("Squire") hereby files this application (the "Application") for allowance and payment of administrative expenses pursuant to the *Fourth Amended Joint Chapter 11 Plan of Reorganization of Seadrill Partners LLC and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 562] (the "Plan"). In support of the Motion, Squire respectfully states as follows:

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<sup>1</sup> A complete list of each of the Reorganized Debtors in these chapter 11 cases may be obtained on the website of the Reorganized Debtors' claims and noticing agent at <https://cases.primeclerk.com/seadrillpartners>. The location of Reorganized Debtor Seadrill Partners LLC's principal place of business and the Reorganized Debtors' service address in these chapter 11 cases is Seadrill Partners LLC, 2nd Floor, Building 11, Chiswick Business Park, 566 Chiswick High Road, London W4 5YS, United Kingdom.

### **PRELIMINARY STATEMENT**

1. Through this Application, Squire seeks allowance and payment of its administrative expense claim under Section 503(b) of the Bankruptcy Code and the Plan.

2. On May 14, 2021, the Court entered the *Order (I) Approving the Disclosure Statement, (II) Confirming the Fourth Amended Joint Chapter 11 Plan of Reorganization of Seadrill Partners LLC and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code, and (III) Granting Related Relief* [Docket No. 570] confirming the Plan.

3. On May 25, 2021, the Debtors filed the *Notice of (I) Entry of Confirmation Order, (II) Occurrence of Effective Date, and (III) Related Bar Dates* [Docket No. 586], which, among other things, stated that the Effective Date of the Plan had occurred on May 24, 2021 and notified parties that the deadline for the filing of requests for allowance of administrative expense claims under the Plan, other than for professional fees, was thirty (30) days from the Effective Date, or June 23, 2021.

4. As of the filing of this Application, there remains an unpaid invoice for post-petition legal services provided by Squire to the Debtors, as shown on **Exhibit A**. While Squire has received indications from counsel for the Debtors that its post-petition invoice will be paid in full, Squire files this Application out of an abundance of caution in light of the impending June 23, 2021 deadline.

### **JURISDICTION AND VENUE**

5. The United States Bankruptcy Court for the Southern District of Texas (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157, and this Court may enter a final order consistent with Article III of the United States Constitution. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

6. The bases for the relief requested herein are sections 105(a), 503(b), and 507(a)(2) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), Rule 9013 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 9013-1 of the Bankruptcy Local Rules for the Southern District of Texas, and the Procedures for Complex Cases in the Southern District of Texas.

### **BACKGROUND**

7. After the Petition Date, Squire provided legal tax services to Debtor, Seadrill International Limited, in connection with employment contract and work rules for Brunei, Thailand, and Indonesia.

8. As of the filing of this application, the Debtors are indebted to Squire in the sum of US \$39,739.01 for post-petition legal services provided to Debtor Seadrill International Limited. A copy of the invoice for the unpaid amounts is attached hereto as **Exhibit A**.

### **BASIS FOR RELIEF**

9. Section 503(b) of the Bankruptcy Code provides that “there shall be allowed administrative expenses, . . . including the actual necessary costs and expenses of preserving the estate . . . .” 11 U.S.C. § 503(b). “In bankruptcy proceedings, ‘administrative expenses’ are granted priority over most unsecured claims.” *Nabors Offshore Corp. v. Whistler Energy II, L.L.C. (In re Whistler Energy II, L.L.C.)*, 931 F.3d 432, 441 (5th Cir. 2019) (*citing* 11 U.S.C. § 507(a)(2)). To qualify as an administrative expenses, the claim must arise from a transaction with the debtor in possession and be beneficial to the estate. *Id.* at 444. This includes not just “costs without which rehabilitation would be impossible,” but the “costs ordinarily incident to the operation of a business.” *Id.* at 443 (*quoting Reading Co. v. Brown*, 391 U.S. 471, 483 (1968)).

10. There can be no question that the provision of legal services to the Debtors were actual, necessary expenses to preserve the Debtors' estates. First, the services provided by Squire arose out of a post-petition transaction with the Debtors. Second, the services provided a benefit to the Debtors' estates as the Debtors required the tax advice to remain in compliance with employment contract and work rules in the various jurisdictions listed above. Therefore, Squire is entitled to payment of all outstanding sums for post-petition services as provided in the Plan.

**WHEREFORE**, Squire requests allowance and payment of administrative expenses in the total sum of \$39,739.01.

Dated: June 23, 2021

Respectfully submitted,

SQUIRE PATTON BOGGS (US) LLP

/s/ Travis A. McRoberts

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**CERTIFICATE OF SERVICE**

I certify that on June 23, 2021, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Travis A. McRoberts  
Travis A. McRoberts

**EXHIBIT A**

Invoice

(Attached)

**IN THE UNITED STATES BANKRUPTCY COURT  
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In re:

Seadrill Partners, LLC, et al.<sup>1</sup>

Reorganized Debtors.

Chapter 11

Case No. 20-35740 (DRJ)

(Jointly Administered)

Related Docket No. \_\_\_\_

**ORDER GRANTING SQUIRE PATTON BOGGS (US) LLP'S APPLICATION  
FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSES**

Upon consideration of *Squire Patton Boggs (US) LLP's Application for Allowance and Payment of Administrative Expenses* (the "Application");<sup>2</sup> by which Squire Patton Boggs (US) LLP ("Squire") requests allowance and payment of an administrative expense claim in the amount of \$39,739.01; and it appearing that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and due and adequate notice of the Application having been given under the circumstances; and sufficient cause appearing therefore, it is hereby:

**ORDERED** that Squire is hereby allowed a Chapter 11 administrative expense claim pursuant to 11 U.S.C. § 503(b)(1) in the total amount of \$39,739.01, which the Reorganized Debtors shall pay within ten (10) days of entry of this Order; and it is further

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<sup>1</sup> A complete list of each of the Reorganized Debtors in these chapter 11 cases may be obtained on the website of the Reorganized Debtors' claims and noticing agent at <https://cases.primeclerk.com/seadrillpartners>. The location of Reorganized Debtor Seadrill Partners LLC's principal place of business and the Reorganized Debtors' service address in these chapter 11 cases is Seadrill Partners LLC, 2nd Floor, Building 11, Chiswick Business Park, 566 Chiswick High Road, London W4 5YS, United Kingdom.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Application.

ORDERED that this Court shall retain jurisdiction over any and all matters arising from or related to the implementation or interpretation of this Order.

Dated: \_\_\_\_\_, 2021

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DAVID R. JONES  
UNITED STATES BANKRUPTCY JUDGE



